



HON. SYLVIA O. HINDS-RADIX
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June 8, 2022

VIA ECF

Hon. Katherine H. Parker
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

The deadline for Defendant to respond to the Complaint is extended to **Thursday, June 23, 2022**. The deadline for the parties to submit a Proposed Case Management Plan is extended to **Wednesday, August 10, 2022**. The Initial Case Management Conference is rescheduled to **Wednesday, August 17 at 10:00 a.m.** in Courtroom 17D, 500 Pearl Street, New York, NY 10007.

SO ORDERED:

Re: *M.W. v. N.Y.C Dep't of Educ., No. 22-cv-1200(JPO)(KHP)*

Katherine H. Parker
HON. KATHARINE H. PARKER
UNITED STATES MAGISTRATE JUDGE
6/9/2022

Dear Judge Parker:

I am Special Assistant Corporation Counsel in the office of Corporation Counsel, Sylvia O. Hinds-Radix, attorney for Defendant in the matter referenced above, wherein Plaintiff seeks solely attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act 20 U.S.C. §1400, *et. seq.* ("IDEA"), as well as for this action.

I write to respectfully request a 2-week extension of time to respond to the complaint, from June 9 to June 23, 2022. This is the third request for an extension and Plaintiff consents. Your Honor granted the second request on May 8, 2022 (ECF 20). Further, the parties jointly respectfully request the adjournment of the Initial Conference *sine die* and a corollary adjournment of the submission of a Proposed Case Management Plan (CMP). The additional time will hopefully facilitate the resolution of this case without the need for a conference or motion practice. We note that our office has successfully settled all of the many dozens of similar IDEA fees-only cases brought by plaintiffs represented by the Dayan Firm in recent years and see no reason why this case will not take that same course.

Accordingly, Defendant respectfully requests that the Court accept this submission and extend Defendant's deadline to respond to the complaint to June 23, 2022, and adjourn the Initial Conference and deadline for submission of the CMP *sine die*.

Thank you for considering these requests.

Respectfully submitted,

/s/ W. Simone Nicholson

Simone Nicholson
Special Assistant Corporation Counsel

cc: Adam Dayan (via ECF)